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February 25, 2009
Via ECFS Transmission

Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: 2008 CPNI Certification Filing
Network Communications International Corp.
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 07, 2009, enclosed for filing please find the 2008 Annual CPNI Compliance Certification submitted on behalf of Network Communications International Corp., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 407-740-3004 or via email to rmorton@tminc.com.

Sincerely,

Robin Norton
Consultant to Network Communications International Corp.

RN/lm

cc: Best Copy and Printing, Inc. - FCC@BCPIWEB.COM
cc: FCC Enforcement Bureau - (2 copies)
cc: Stephanie Jackson - NCIC - (cover letter only)
file: NCIC - FCC
tms: FCCx0901

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: **2008**

Name of company covered by this certification: **Network Communications International Corp.**

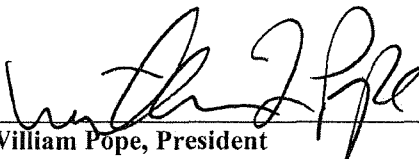
Form 499 Filer ID: **817994**

Name of signatory: **William Pope**

Title of signatory: **President**

I, **William Pope**, certify and state that:

1. I am the **President** of **Network Communications International Corp.** and, acting as an agent of the company, I have personal knowledge of **Network Communications International Corp.**'s operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **Network Communications International Corp.**'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



William Pope, President

02-24-09

Date

Exhibit A
Statement of CPNI Procedures and Compliance

**Statement of CPNI Procedures and Compliance
For 2008
Network Communications International Corp.**

Network Communications International Corp. operates solely as an operator service provider and as such provides only operator assisted call completion services for transient end users and for incarcerated persons in correctional facilities. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and we do not obtain or retain any CPNI that could be used for marketing purposes.

Our marketing efforts are directed only towards payphone owners, hospitality locations, and occasionally to correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless calling party can identify the call detail related to their inquiry. Customers (inbound callers into our Customer Service Center) are required to give the call detail information to the Customer Service Representatives as well as their names prior to providing any assistance or information. We only disclose the information requested that comes directly from the billed information. The customer must have the call detail/bill when calling and must be the name on the account.

For inquiries regarding correctional institution prepaid call account call detail, an end user must provide the credit card number used to fund the account, the billing address for the credit card, the name of the inmate, and the allowed "call to" numbers as well as the call detail in question in order to establish identity before any information regarding call detail is provided.

We do not disclose call detail on line to end users under any circumstances.

As an operator services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have processes in place to safeguard the call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is

protected; only authorized NCIC personnel have access to the database. It is not accessible by anyone outside NCIC.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2008, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

Due to the nature of the operator services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.